

Fred C. Hart Associates, Inc.

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December 16, 1987

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Chief, Investigations and
Compliance Branch
Emergency and Remedial Response
Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, N.Y. 10278

Attention: Nigel Robinson, Project Officer

Re: Asbestos Disposal Sites
Morris County, N.J.

Dear Mr. Robinson:

I am writing to acknowledge the receipt of EPA's comments to the Remedial Investigation (RI) Report for the Asbestos Disposal Sites in Morris County, N.J. and to outline areas of concern regarding these comments which we propose to discuss individually at our meeting scheduled for December 17, 1987.

In general, we have four major concerns pertaining to your comments. Our first concern is that you request additional information and identify deficiencies in the RI report which appear to be inconsistent with the original scope of work. As you may recall, National Gypsum agreed to implement the EPA Work Plan which was appended to the Consent Order (Index No. CERCLA-50103) in Appendix I. HART developed this scope of work into a Site Operations Plan (SOP) which you reviewed and approved. We do not believe EPA should require additional work beyond the scope of work originally approved by EPA and incorporated into the Consent Order.

In one comment (page 19), for example, you state that, "the surface water data collected for the Millington site do not render a meaningful characterization of heavy metal migration because only two downstream points are considered, one immediately downstream and one ten miles downstream at the Commonwealth Water Company intake." In response, it should be noted that HART collected surface water samples at locations that EPA selected and then approved in the Site Operations Plan. In another comment (page 23), you recommended further geologic investigational work which was not required by EPA's original work

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plan. EPA's original scope of work called for the definition of shallow groundwater flow and only required one bedrock well (upgradient at the Millington site) if the water table occurred in unconsolidated material. The water did occur in unconsolidated material, and thus HART installed a total of 22 shallow wells at the four sites and one bedrock well at the Millington site in accordance with the approved Site Operations Plan.

Regarding the air sampling program, HART's stated purpose in the approved Site Operations Plan was to identify whether a significant amount of asbestos would be released during any remedial action since members of the field team were already required to wear Level C protection during soil-disturbance activities. In your comments to the SOP dated October 9, 1985, you recommended that we use the air sampling data collected during drilling to try to simulate what would happen during excavation of a four foot hole, because you understood that many asbestos fibers would be released during the digging of pile of dry or semi-friable asbestos and that the asbestos would have to be wetted down continuously during any remediation. In direct response, we collected air samples during the drilling of each borehole to be completed into a monitoring well at a location within three feet of the borehole. Most of the boreholes were located in areas containing asbestos. Further, upwind-downwind samples were collected during test pit operations to provide more representative data with which to calculate air quality impacts resulting from future excavations. One of the two test pits was located in the asbestos mound. At your request, asbestos was wetted down for health and safety purposes during all soil-disturbance activities as it would be during any excavation. Because our air program was in compliance with the approved SOP and provided us with the information needed to complete the feasibility study, further air sampling is not necessary.

Secondly, you identify several NCP criteria which we did not discuss or did not discuss in sufficient detail in the RI report. We have considered your comments and will address items such as receptors potentially at risk, toxicology of hazardous substances, environmental fate and transport, climate, drainage patterns, flood potential and frequencies, and welfare concerns at our upcoming meeting. However, you also identify other NCP criteria which are more properly applicable to the implementation of the Feasibility Study (FS) than the Remedial Investigation. These categories include such items as potential response actions, bench-scale treatability studies, and ability to maintain remedy. They should be deferred until the FS phase is undertaken.

Our third concern is that you criticized our use of methodologies which are consistent with the Superfund Public Health Evaluation Manual. The most obvious example is your comment with respect to averaging data to obtain a representative site concentration. This procedure was utilized in the Endangerment Assessment in compliance with the Superfund Public Health Evaluation Manual. Upgradient and



downgradient results were discussed qualitatively throughout the report to establish trends and were also discussed quantitatively in the Endangerment Assessment. Indicator chemicals were selected with consideration to established trends.

Fourthly, we are concerned about Ebasco's analytical data from the split samples. It should be noted that the laboratory we used for priority pollutants analyses was also a member of the Contract Laboratory Program and was approved by EPA in the Site Operations Plan. Therefore, it is misleading to suggest that one data set is better than the other. Before we attempt to explain any discrepancies in the sample data, we need to obtain from you a set of Ebasco's data to ensure that it was properly validated and that the numbers were properly transcribed.

With these general concerns in mind, we look forward to discussing each individual comment with you at our meeting in order to determine how we can best complete the RI Report to meet your requirements.

Sincerely,

FRED C. HART ASSOCIATES, INC.

Frances B. Barker
Project Manager

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(01005)

cc: William Tucker
Jim Moorman
Rebecca Beasley
Tom Morahan

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